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6 Attorneys for Defendants
7 Giga Watt, Inc. and
GigaWatt, Pte., Ltd.
8

9 UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

10 MARK MOSS,

11 Plaintiff,

12 v.

13 GIGA WATT, INC., et al.,

14 Defendants.

CASE NO.: 2:18-cv-00100-SMJ

STIPULATION TO EXTEND TIME
TO RESPOND TO COMPLAINT

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COMPLAINT

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1 WHEREAS, on March 19, 2018, Plaintiff Mark Moss filed a Complaint
2 alleging claims for rescission of contract and violations of Section 12(a)(1) of the
3 Securities Act of 1933, 15 U.S.C. §§ 77l(a)(1) and Section RCW 21.20.430 of the
4 Washington State Securities Act against Giga Watt, Inc. and GigaWatt, Pte., Ltd.
5 (collectively, “Defendants”).

6 WHEREAS, Plaintiff represents that service was effected on Giga Watt, Inc.
7 on March 26, 2018.

8 WHEREAS, Defendants have agreed to waive service of summons for
9 GigaWatt, Pte., Ltd.

10 WHEREAS, the parties, in consideration of the above, have met and
11 conferred regarding an extension of time to respond to the Complaint.

12 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and
13 among the respective parties hereto that:

14 1. Defendants shall not have to move, or otherwise to respond to the
15 Complaint sooner than 75 days after the date of this Stipulation.

16 2. This Stipulation is entered into without prejudice to any party seeking
17 any interim relief.

18 3. Nothing in this Stipulation shall be construed as a waiver of any of
19 Defendants’ rights or positions in law, or in equity, or as a waiver of any defenses
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1 that Defendants would otherwise have, including, without limitation, jurisdictional
2 defenses.

3 The parties respectfully enclose below a proposed order to such effect.

4
5 RESPECTFULLY SUBMITTED AND DATED this 13th day of April
6 2018.

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8 WILSON SONSINI GOODRICH & ROSATI
9 Professional Corporation

10 By: /s/ Barry M. Kaplan

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20 *and GigaWatt, Pte., Ltd.*

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3 By: /s/ Beth E. Terrell

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Attorneys for Plaintiff Mark Moss

CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

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